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August 7, 2018

**By Hand and ECF**

The Honorable Martin Glenn  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, NY 10004-1408

Re: *Motors Liquidation Company Avoidance  
Action Trust v. JPMorgan Chase Bank,  
N.A.*, Case No. 09-00504 (MG)

Dear Judge Glenn:

We jointly submit this letter on behalf of our client, JPMorgan Chase Bank, N.A., the other members of Defendants Steering Committee, and plaintiff, the Motors Liquidation Company Avoidance Action Trust.

The Honorable Martin Glenn  
August 7, 2018  
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In a July 31, 2018 letter (Dkt. No. 1060), the parties reported that they would update the Court, on or before August 7, 2018, as to the parties' progress in finalizing a stipulation "memorializ[ing] the agreement that [the Parties] have been able to reach to date, applying the principles in the Court's Memorandum Opinion Regarding Fixture Classification and Valuation," with respect to both fixture classification and valuation. The parties remain in active discussions as to the stipulation, but require additional time to finalize it. The parties will file the stipulation memorializing agreements reached to date, or provide the Court with a further update, on or before August 16, 2018.

The parties are available to answer any questions that the Court may have.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'MW', followed by a comma.

Marc Wolinsky

cc: Counsel of Record (by ECF and email)